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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LaTesha Watson,

Plaintiff

V.

City of Henderson, et al.,

Defendants

Case No.: 2:20-cv-01761-CDS-BNW

**Stipulation and Proposed Order Extending
Deadlines for Responses and Replies to
Motions for Summary Judgment**

(FIRST REQUEST)

Defendants City of Henderson (the “City”), Kevin Abernathy, and plaintiff LaTesha Watson (collectively the “Parties”) stipulate to extend the deadline for the Parties’ to respond to the motions for summary judgment up to and including April 7, 2023, and the replies in support of those motions up to and including April 28, 2023. The Parties make the following stipulation for good cause, not for the purpose of delay, and for the following reasons:

25 1. On November 1, 2021, Watson amended her complaint, asserting nine causes of
26 action against the City, Abernathy, and several previously named individual defendants.

27 2. During discovery, Watson voluntarily dismissed five of those defendants and
28 another after it had closed.

1 3. On February 16, 2023, Judge Weksler granted the Parties' stipulation to extend the
 2 dispositive motion deadline to February 22, 2023.¹

3 4. Watson then filed two motions for partial summary judgment: one against the City²
 4 and one against Abernathy.³

5 5. The City and Abernathy both also filed motions for summary judgment.⁴

6 6. After the motions for summary judgment were filed, Judge Weksler granted
 7 Abernathy's motion to compel additional deposition testimony from Watson. The Parties are
 8 currently working to confirm the date of that deposition, which is tentatively set for March 23,
 9 2023.

10 7. Under Local Rule 7-2(b), the Parties' responses to the summary-judgment motions
 11 are currently due on March 15, 2023, and the replies in support of those motions are due on March
 12 29, 2023.

13 8. Given the number of claims still at issue in this dispute and on which the Parties
 14 have moved for summary judgment, and the complex legal issues involved within each, as well as
 15 the time needed for Watson's continued deposition, the Parties need additional time to complete
 16 responses and their replies to the motions.

17 9. The Parties have agreed to the extensions requested.

18 10. This stipulation is made in good faith and not for the purpose of delay.

26 ¹ ECF No. 155.

27 ² ECF No. 157.

28 ³ ECF No. 158.

⁴ ECF Nos. 162, 164.

1 Therefore, the Parties respectfully request an extension for the parties to file their responses
2 to the pending motions for summary judgment, up to and including April 7, 2023, and the replies
3 in support of those motions up to and including April 28, 2023.

5 DATED this 13th day of March 2023.

DATED this 13th day of March 2023.

⁶ COOK & KELESIS, LTD.

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/s/ Marc P. Cook

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DATED this 13th day of March 2023.

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/s/ Nicholas M. Wieczorek

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Attorneys for Defendant Kevin Abernathy

ORDER

21 Good cause appearing, IT IS HEREBY ORDERED that the parties' stipulation is
22 GRANTED. Responses to the motions for summary judgment [ECF Nos. 157, 158, 162, 164] shall
23 be due on April 7, 2023. The replies in support of those motions shall be due on April 28, 2023.

24 **IT IS SO ORDERED.**

25 DATED: March 14, 2023

UNITED STATES DISTRICT JUDGE